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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of:) METHOD AND SYSTEM FOR
AKIHIRO NAGATA et al) TREATING A POWER TRANS-
Serial No. 09/008,675) MISSION BELT/BELT SLEEVE
Filed January 16, 1998)
Group Art Unit 1724
Examiner R. Hopkins

APPELLANT'S REPLY BRIEF UNDER 37 C.F.R. §1.193

Assistant Commissioner for Patents
Washington, D.C. 20231
Sir:

This is a reply to the Examiner's Answer mailed on August 3, 2000 in the
above matter.

Issue No. 1

In the bridging paragraph beginning on page 8 of the Examiner's Answer,
the Examiner notes accurately that the pressure wrap in Perkins is described to be option-
ally made from nylon. The Examiner then concludes

37 CFR 1.8
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"[t]herefore, since nylon, a synthetic resin film, is wrapped around the surface of the belt and the belt with the nylon wrap is vulcanized, then both method claim 1 and apparatus claim 14 are deemed to be clearly anticipated by Perkins."

In concluding the first full paragraph on page 9 of the Examiner's Answer, the Examiner states "Examiner respectfully submits the fact that appellant's specification identifies nylon as a synthetic resin film inherently means that the film also is vapor impervious."

Clarification is appropriate at this time as to the general definition of a "film". Appellant is enclosing herewith a copy of the page from the *Random House Webster's College Dictionary* with the definition of "film" thereon. As can be seen from the definition of film, there is nothing inherent, regardless of the material, that equates "film" with "vapor-impervious". Appellant has throughout the specification and claims characterized the film as "vapor-impervious".

Perkins does not anywhere in his disclosure identify the nylon wrap material as a "vapor impervious" film. The Board can take notice of the fact that nylon material is often woven, as in hosiery, to increase its mechanical strength. In this woven state it is not vapor-impervious. For a pressure wrap as used in the Perkins environment, a woven material may logically be a more practical pressure applying structure than a "vapor-impervious film", which is neither taught nor suggested in Perkins.

In support of his position, the Examiner for the first time cites, for the first time provides copies of, and for first time relies on U.S. Patent No. 4,435,351 (Gilmore)

and Korean Reference No. 90-6987 (Korea '987 - Abstract only). Not only is it inappropriate to raise these references for the first time in the Examiner's Answer, it is also inappropriate to use them as the Examiner has in an attempt to interpret Perkins.

It is elementary that for a rejection under 35 U.S.C. §102 to be appropriate, the relied upon teachings must reside within the four corners of a single document, and in this case Perkins. Using the separate Gilmore and Korea '987 documents relating to pipe formation to interpret Perkins is not appropriate.

Even using the two new references cited by the Examiner, the Examiner's position is not supported. Aside from the fact that both newly cited references are directed to pipe or hose formation, they do not alone or collectively stand for what the Examiner states. The passage in Gilmore referenced by the Examiner briefly describes a vulcanization preparation in which hose components are built upon a mandrel, as described beginning in column 1, line 48 of Gilmore. It is then described that a "cover layer of elastomeric material is applied" after which a cure tape made of wetted nylon is applied. Gilmore does not describe the wetted nylon tape as being vapor impervious. It is possible that the cover layer underlying the wetted nylon tape, and not the nylon tape, is vapor impervious.

The Abstract of Korea '987 is at best sketchy. There is disclosure of a "heat contracting tape". The Examiner assumes from the Abstract that the tape is vapor impervious. However, in the first paragraph of the Abstract, the tape is characterized as containing a "porous Teflon film and bleeder".

In short, the Perkins reference does not teach a vapor impervious film as claimed. The newly cited prior art, which is not even related to power transmission belt formation and should not be applied in interpreting Perkins, does not teach what the Examiner says it does.

In conclusion, Perkins does not disclose a vapor impervious film as claimed, either expressly or inherently.

In the last full paragraph on page 9 of the Examiner's Answer, the Examiner acknowledges that cotton wrap would not be vapor impervious and that the use of the airtight heat resistant bag or envelope proposed by Perkins would logically be used only with cotton as opposed to a nylon pressure wrap. This is reading well beyond the teachings of Perkins to come to such a conclusion. Just as logically, if not more logically, one would assume that if the described nylon pressure wrap would be vapor impervious and function as well as a cotton wrap, one would eliminate the need to use the heat resistant bag or envelope by using the nylon wrap. The use of a cotton wrap would have no apparent advantages and would introduce the requirement to perform an additional step and use an additional element, that being the heat resistant bag or envelope.

Issue No. 2

The Examiner states in the paragraph bridging pages 10 and 11 that "it would have been obvious to someone of ordinary skill in the art at the time of the invention to extend the vapor impervious film wrapping of Perkins to extend over the edges of belt

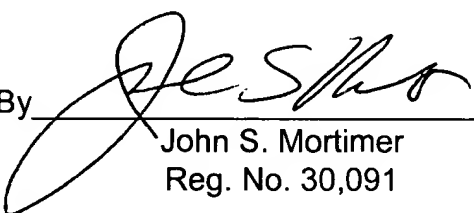
sleeve in order to ensure edges of the belt are not damaged during vulcanization by the vapor in the pretreatment chamber." However, if Perkins was using the pressure wrap to provide a vapor impervious film, Perkins may have logically extended the film over the edges so as not to leave the edges exposed.

Conclusion

It is respectfully requested that the Examiner's final rejection of claims 1-10, 13-17, and 21-26 be reversed.

Respectfully submitted,

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ornamental work of fine silver, gold, or other metal wires, esp. lacy jewelers' work of scrolls and arabesques. 2. anything very delicate or fanciful: a *filigree of frost*. —*adj.* 3. composed of or resembling filigree. —*v.t.* 4. to adorn with or form into filigree. [1685-95; < F *filigrane* < *li filigrana* < L *filī*, comb. form of *filum* thread + *grāna*, pl. of *grānum* GRAIN]

filigree (fī'grē), *n.*, pl. *filigrees*. 1. a delicate, lacy, ornamental work of fine silver, gold, or other metal wires, esp. lacy jewelers' work of scrolls and arabesques. 2. anything very delicate or fanciful: a *filigree of frost*. —*adj.* 3. composed of or resembling filigree. —*v.t.* 4. to adorn with or form into filigree. [1685-95; < F *filigrane* < *li filigrana* < L *filī*, comb. form of *filum* thread + *grāna*, pl. of *grānum* GRAIN]

filio (fī'lo), *n.*, pl. *filios*. 1. a native or inhabitant of the Philippines. [1895-1900; < Sp. der. of (*las Islas*) *Filipinas*]

fill (fīl), *v.t.* 1. to make full; put as much as can be held into: *fill a jar with water*. 2. to occupy to the full capacity: *The crowd filled the hall*. 3. to supply plentifully: *fill a house with furniture*. 4. to feed fully; satiate. 5. to put into a receptacle: *fill sand into a pail*. 6. to be plentiful throughout: *Fish filled the rivers*. 7. to pervade completely: *The odor filled the room*. 8. to furnish (a vacancy or office) with an occupant. 9. to occupy and perform the duties of (a position, post, etc.). 10. to supply the requirements or contents of (an order for goods, a medical prescription, etc.); execute. 11. to supply (a blank space) with written matter, decorative work, etc. 12. to meet satisfactorily, as requirements: *fill a need*. 13. to stop up or close (a cavity, hole, etc.): *fill a tooth*. 14. to insert a filling into (a pastry or other food). 15. a. to distend (a sail) by pressure of the wind so as to impart headway to a vessel. b. to brace (a yard) so that the sail will catch the wind on its after side. 16. to adulterate: *fill soaps with water*. 17. to build up the level of (an area) with earth, stones, etc. —*v.i.* 18. to become full. 19. to become distended, as sails with the wind. 20. fill in, a. to supply (missing information). b. to complete by adding detail, as a design or drawing, or by inserting required information into, as a document or form. c. to act as a substitute. d. to fill (a crack, hole, etc.) with some reparative substance. e. to supply information to: *fill us in on your work experience*. 21. fill out, a. to complete (a document or form) by supplying required information. b. to become rounder and fuller, as the human face or figure. 22. fill up, a. to fill completely. b. to become completely filled. —*n.* 23. a full supply; enough to satisfy want or desire. 24. a quantity of earth, stones, etc., for building up the level of an area of ground. Compare **BACKFILL**. [bef. 900; ME; OE *fillan*] —*fill-a-ble*, *adj.*

fill-a-gree (fī'lə grē'), *n.*, *adj.*, *v.t.*, *greed*, *gree-ing*. **FILIGREE**.

fill-er (fī'lər), *n.* 1. a person or thing that fills. 2. a thing or substance used to fill a gap, cavity, or the like. 3. a substance used to fill cracks, pores, etc., in a surface before painting or varnishing. 4. a substance used to give solidity, bulk, etc., as sizing. 5. journalistic material of secondary importance used to fill out a column or page. 6. cotton, down, or other material used to stuff or pad an object. 7. a plate inserted between two parallel structural members to connect them. 8. the tobacco forming the body of a cigar. [1490-1500]

fill-er or **fill-er** (fī'lər, fī'lār), *n.*, pl. *fill-ers*. 1. a monetary unit of Hungary, equal to 1/100 of the forint. [1900-05; < Hungarian < MHC *vier* type of coin = *vier* FOUR + *-er* -ER]

fillet (fī'lēt), *n.*, usually *fī lā'* for 1, 7), *n.*, *v.* **FILLET** (fī'lēt) or, for 1, 7, **filleted** (fī lād'), **fillet-ing**. —*n.* 1. a boneless cut or slice of meat or fish, as the beef tenderloin. 2. an ornamental ribbon for the head; headband. 3. any narrow strip, as of wood, metal, or fabric. 4. a decorative line impressed on a book cover. 5. a narrow flat molding raised or sunk between larger moldings. b. the narrow flat raised strip between two flutes of a column. 6. LEMNISCUS. —*v.t.* 7. to cut or prepare (meat or fish) as a fillet. 8. to bind or adorn with or as if with a fillet. [1300-50; ME *fillet* < AF, MF, der. of *fil* thread]

fill-in, *n.* 1. a person or thing that fills in, as a substitute, replacement, or insertion. 2. a brief summary; a rundown. [1915-20]

fill-ing (fī'līng), *n.* 1. an act or instance of filling. 2. something that is put in as a filler. 3. a substance such as cement, amalgam, gold, or the like, used to fill a cavity caused by decay in a tooth. 4. Also called **weft**, **woof**, yarn carried by the shuttle and interlacing at right angles with the warp in woven cloth. [1350-1400]

fill-ing sta-tion, *n.* SERVICE STATION (def. 1).

fill-ly (fī'lē), *v.t.* 1. to strike with the nail of a finger snapped from the end of the thumb. 2. to tap or strike smartly. 3. to drive by or as if by a fillip. —*v.i.* 4. to make a fillip with the fingers. —*n.* 5. an act or instance of fillipping; a smart tap or stroke. 6. anything that tends to rouse, excite, or revive; a stimulus. [1425-75; late ME *philippe* to make a sound with thumb and right forefinger]

Fill-more (fīl'mōr, -mōr), *n.* Millard, 1800-74, 13th president of the United States 1850-53.

fil-ly (fī'lē), *n.*, pl. *fil-ies*. 1. a young female horse. 2. Informal. a girl or young woman. [1400-50; late ME *fily* < ON *fyla* female FOAL]

film (fīlm), *n.* 1. a thin layer or coating. 2. a thin sheet of any material: a *film of ice*. 3. a thin skin or membrane. 4. a delicate web of filaments or fine threads. 5. a thin haze, blur, or mist. 6. a cellulose nitrate or cellulose acetate composition made in thin sheets or strips and coated with a light-sensitive emulsion for taking photographs or motion pictures. 7. **MOTION PICTURE** (def. 1, 2). 8. Often, **films**, a motion picture collectively. b. the motion-picture industry, or its productions, operations, etc. c. motion pictures, as a genre of art or entertainment: *experimental film*. —*v.t.* 9. to cover with a film, thin skin, or pellicle. 10. a. to photograph with a motion-picture camera. b. to reproduce in the form of a motion picture: *to film a novel*. —*v.i.*

11. to become covered by a film. 12. to direct, make, or otherwise engage in the production of motion pictures. [bef. 1000; ME *filme*. OE *filmen* membrane] —*film-like*, *adj.*

film-dom (fīlm'dəm), *n.* the motion-picture industry. [1910-15]

film-go-er (fīlm'gō'ər), *n.* MOVIEGOER.

film-ic (fīl'mik), *adj.* 1. pertaining to or characteristic of motion pictures. [1925-30] —*film-i-cal-ly*, *adv.*

film-land (fīlm'lænd), *n.* a producer or director of motion pictures. [1905-10] —*film-land-ing*, *n.*

film-noir (fīlm'noir), *n.* 1. a motion picture genre marked by grim urban settings, cynical, bleakly pessimistic characters, and starkly shadowed photography. 2. a motion picture in this genre. [1955-60; < F: *le noir* black film]

film-og-ra-phy (fīl mōg'rə fē), *n.*, pl. *-phies*. a listing of motion pictures by actor, director, or the like, usu. including facts about the production of each film. [1960-65; FILM + (BIBLIO)GRAPHY]

film-strip (fīlm'strīp), *n.* a length of film containing a series of related transparencies for projection on a screen. [1925-30]

film-y (fīl'mē), *adj.* **FILM-IER**, **FILM-EST**. 1. thin and light: *fine and gauzy*. 2. hazy or misty; glazed. [1595-1605] —*film-i-ly*, *adv.* —*film-i-ness*, *n.*

Fil-o-fax (fī'lə faks'), *Trademark*. a datebook also containing space for addresses, a calendar, and specialized inserts.

filose (fī'lōs), *adj.* 1. threadlike. 2. ending in a threadlike process [1815-25; < L *filum* a thread + *-ose*]

fil (fīl), *n.*, pl. *fil*s. 1. a monetary unit of Bahrain, Iraq, Jordan, and Kuwait, equal to 1/100 of a dinar. 2. a monetary unit of the United Arab Emirates, equal to 1/100 of a dirham. 3. a monetary unit of the Republic of Yemen, equal to 1/100 of a rial. Often, *fil*. [1885-90; < Ar: *fil* (fēs), *n.*, pl. *fil*s. French son; often used after a name with the meaning of Jr., as in *Dumas fils*. Compare **PÈRE**]

filter (fīl'tər), *n.* 1. any substance, as cloth, paper, porous porcelain, or charcoal, through which liquid or gas is passed to remove suspended impurities or to recover solids. 2. any device, as a tank or tube, containing such a substance for filtering. 3. any of various analogous devices, as for removing dust from air or impurities from bacco smoke. 4. Informal. a filter-tipped cigarette or cigar. 5. a lens screen of dyed gelatin or glass used in photography to control the rendering of color or to diminish the intensity of light. 6. an electronic circuit or device that passes certain frequencies and blocks others. —*v.t.* 7. to remove by the action of a filter. 8. to act as a filter for: *to slow or partially obstruct the passage of*. 9. to pass through or as if through a filter. —*v.i.* 10. to pass or slip through slowly, as through an obstruction or a filter; penetrate. [1375-1425; late ME *filre* < ML *filtrum* felt, piece of felt used to strain liquids < Gmc; see **RAFI**] —*filter-er*, *n.*

filter-a-ble (fīl'tər ə bəl) also **filtrable**, *adj.* 1. capable of being filtered. 2. capable of passing through bacteria-retaining filters. [1905-10] —*filter-a-bil-i-ty*, *filter-a-ble-ness*, *n.*

filter-a-ble vi-rus, *n.* a virus small enough to pass through a bacteria-retaining filter: an informal indicator of size, as recent filters can hold back the smallest viruses. [1910-15]

filter bed, *n.* a pond or tank having a false bottom covered with sand and serving to filter river or pond waters. [1870-75]

filter feed-er, *n.* any aquatic animal, as a sponge or clam, that feeds by straining food particles and small organisms from the water.

filter tip, *n.* 1. a mouthpiece for a cigarette or cigar having a means of filtering the smoke. 2. a cigarette or cigar having such a mouthpiece. [1930-35] —*filter-tipped*, *adj.*

filth (fīlth), *n.* 1. offensive or disgusting dirt or refuse. 2. foul condition. 3. moral impurity, corruption, or obscenity. 4. vulgar or obscene language or thought. [bef. 1000; ME; OE *fylth*. See **FOUL**, **TH**]

filth-y (fīl'thē), *adj.* **FILTH-IER**, **FILTH-EST**, *adv.* —*adj.* 1. foul with characterized by, or having the nature of filth: disgustingly or completely dirty. 2. vulgar or obscene: *filthy language*. 3. contemptibly offensive, vile, or objectionable. 4. abundantly supplied (often fol. by *with*): *They're filthy with money*. —*adv.* **Idiom**. 5. *filthy rich*, extremely wealthy. [1350-1400] —*filth-i-ly*, *adv.* —*filth-i-ness*, *n.*

filthy lu'cre, *n.* Facetious. money, as contrasted with nonmaterialistic rewards. [1520-30]

fil-trate (fīl'trāt), *v.* **-trat-ed**, **-trat-ing**, *n.* —*v.t.* 1. to filter. —*v.i.* 2. liquid that has been passed through a filter. [1605-15; < ML *filtratus*, p.p. of *filtrare* to filter] —*fil-trat-a-ble*, *adj.* —*fil-trat-ion*, *n.*

filum (fī'ləm), *n.*, pl. *-la* (-lā). a threadlike structure: filament. [1855-60; < L: a thread, filament, fiber]

fin (fīn), *n.*, pl. *-brī-ae* (-brē ē'). *Biol.* a fringe or fringe-like border, as around a petal, orifice, or duct. [1745-55; < NL: *fimbria* (pl.) border, fringe] —*fin-bri-al*, *adj.*

fin-bri-ate (fīm'brē-āt), *adj.* also **fin-bri-at-ed** (-ēd), *adj.* having a fimbria or fimbriae. [1480-90; < L] —*fin-bri-a-tion*, *n.*

fin (fīn), *n.*, *v.* **finned**, **fin-ning**. —*n.* 1. a membranous, winglike paddlelike organ attached to any of various parts of the body of certain aquatic animals. 2. a winglike appendage to a hull, as one for controlling the dive of a submarine. 3. any of certain small, stabilizing structures on an aircraft, designed to increase directional stability. 4. any of a number of standing ridges, as on a radiator or engine cylinder, intended to maximize heat transfer to the surrounding air (on an automobile body) a fin-shaped ornamental part, esp. on a radiator (tail fin). 6. *usu.*, *fin*s. **RUPES** (def. 2). —*v.t.* 7. to provide

—*v.i.* 8. to lash the water with the fins. —*fin-like*, *adj.* —*fin/like*, *adj.*

fin (fīn), *n.* *Slang*. a five-dollar note. [1910-15]

fin (fīn), *n.* a five-pound note < Yiddish *fin* (five)

fin (fīn), *n.* 1. Finland. 2. Finnish.

fin (fīn), *n.* 1. finance. 2. financial. 3. **FINANCE** (fīn'āns), *n.* 1. the management of money, esp. the management of a business or the management of a government. 2. the management of a person's affairs. 3. the management of a fortune. 4. to get or achieve: *to finagle an invitation*. 5. a scheme. [1925-30, *fin* < *finagle* to shirk, renege] —*fin-ly*, *adv.* 1. pertaining to finance, or time. 2. ultimate: *the final decision*. 4. constituting a final step: *the final decree*. —*n.* 6. something that is the last and decisive gain: *the last and decisive gain*. b. the last, usu. commodity. [1300-50; ME < L *finis* end, *fin* the final edit of a book and producer. Compare **FINALE** (fīnāl'ē, -nāl'ē), *n.* 1. the conclusion, or the conclusion, of a concert, opera, or composition. 2. the conclusion, or the conclusion, of a proceeding. 3. the conclusion, or the conclusion, of a U.S. college basketball championship. 4. the conclusion, or the conclusion, of a contest, as in a game. [1900]

fin-ly (fīn'lē), *n.*, pl. *-ties*. 1. something that is final. 2. something that is final. 3. something that is final. 4. something that is final. 5. something that is final. 6. something that is final. 7. something that is final. 8. something that is final. 9. something that is final. 10. something that is final. 11. something that is final. 12. something that is final. 13. something that is final. 14. something that is final. 15. something that is final. 16. something that is final. 17. something that is final. 18. something that is final. 19. something that is final. 20. something that is final. 21. something that is final. 22. something that is final. 23. something that is final. 24. something that is final. 25. something that is final. 26. something that is final. 27. something that is final. 28. something that is final. 29. something that is final. 30. something that is final. 31. something that is final. 32. something that is final. 33. something that is final. 34. something 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